

OFFICE OF THE DEPUTY UNDER SECRETARY OF DEFENSE

WASHINGTON, D. C. 20301



POLICY REVIEW

11 AUG 1980


MEMORANDUM FOR THE CHAIRMAN, DIRECTOR OF CENTRAL INTELLIGENCE
SECURITY COMMITTEE

SUBJECT: DCI Security Committee Investigative Standards Working
Group Personnel Security Survey

In accordance with your memorandum of 5 June 1980, which forwarded subject report along with recommendations based on the report and called for comments by 15 July 1980, as well as your most considerate subsequent agreement to extend the deadline for submission of comments to 15 August 1980, the enclosed comments, observations and recommendations are provided.

In order to more clearly present the views of officials of the Department of Defense along with Defense policy, the comments are provided in two sections; one dealing with the report itself, and the other with the recommendations as forwarded to you by the Acting Chairman of the Investigative Standards Working Group under SECOM-D-235 of 5 June 1980.

I am sure that after consideration of the comments of the Members of the Security Committee and discussion of all pertinent aspects of the report and its recommendations, there can be reached an agreement concerning investigative standards for access to sensitive compartmented information that will contribute to the security of that information within the bounds of reasonable expenditure of effort.


Maynard C. Anderson
Deputy Director for
Security Policy

Attachments

On file OSD release instructions apply.

SUBJECT: DCI Security Committee Investigative Standards Working Group Personnel Security Survey; Comments Concerning Report

Members of the Investigative Standards Working Group are to be commended for their efforts. The Survey should contribute to our attempts to modernize the Government's personnel security programs particularly following critical review of the Report by the Security Committee. The specific comments that follow are meant to be constructive and are offered in the interests of improving the report and its significance to the Intelligence Community.

It is difficult to track some parts of the report in the context of other parts of it. Some of the charts and figures are difficult to comprehend and it is suggested that their value would be enhanced if each was accompanied by a brief narrative explaining its significance.

One of the more important issues addressed in the study is the period of coverage that should be required in a Background Investigation. The working group in its conclusion (No. 4), considers that less than 15-year coverage is not adequate. The results of the study appear to show that of the 5,204 investigations reviewed, 254 resulted in an adverse decision against an individual. Of these 254 cases, the working group maintains that 6 of those would not have developed the pertinent denial data unless there had been 15 years of coverage. Presumably, this means that there were no indicators or leads to the denial data within the last 14 years. Surprisingly, what we appear to have in these six cases are six individuals who have clear records for 14 years but who were involved in something beyond that time frame which resulted in an adverse action at the present time. We realize that this is possible, but we must ask whether, perhaps, this statistic may have resulted through an error on the part of the adjudicators who contributed data to the survey. It is our understanding that the working group did not actually review these six cases but relied on the contribution of the adjudicators. Therefore, it is recommended that the Security Committee ask the Working Group to retrieve these six cases for review in order that a determination may be made as to whether there was a reporting error. Otherwise, important policy decisions may be made on the basis of erroneous data.

An additional factor in this area is the decision that was made as to the approach to be used in determining what "period of coverage" is required to uncover an incident of security significance. On page 7, Section I of the report, an example is given of an applicant who has lived in the same house for the past ten years. His neighbor has known him all that time and recalls a potentially significant incident which occurred seven years ago. Although in practice a one-year

period of coverage would have revealed this data, the study recorded this as requiring a seven year period of coverage. We believe that using this approach tends to distort the study. The survey should not have been concerned as to when the potentially significant incident occurred, but rather what minimum coverage was needed to develop a lead to that incident.

Another significant conclusion (No. 6) in the report is that a 15 year period of coverage would require no more than an average 32% increase in investigative effort. It should be emphasized that in the DoD which conducts far more investigations than any other agency, the difference would be a 54% increase between a Standard BI (5 years) and a Special BI (15 years).

Regarding Conclusion No. 7, a better explanation is required as to how the data supports the concept of periodic reinvestigation. If Section VI serves as the basis for this conclusion, then the Section would be improved if there were shown a direct relationship between the data and the conclusion. That relationship is not clear in the present draft.

Support for Conclusion No. 11 could be stronger if it were rewritten to provide specific statistics on the sources (education checks and listed references or any others) that provide little information. A fuller discussion is needed to explore the feasibility of dropping or curtailing sources that have been shown to be of marginal productivity.

Regarding the conclusion (No. 12) that NAC's are not very productive, some statistics should be included in the conclusion paragraph. This adverse evaluation of the NAC is significant and the narrative in the conclusion should be expanded to clarify the significance of the conclusion.

Comments of the Director, Defense Investigative Service are attached.